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**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN  
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
G.M.; A.S.; and L.T., individuals on behalf of  
themselves and all others similarly situated,

Plaintiffs  
v.

UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS, a governmental entity;  
BUREAU OF PRISONS DIRECTOR  
COLETTE PETERS, in her official capacity;  
FCI DUBLIN WARDEN THAHESHA JUSINO,  
in her official capacity; OFFICER  
BELLHOUSE, in his individual capacity;  
OFFICER GACAD, in his individual capacity;  
OFFICER JONES, in his individual capacity;  
LIEUTENANT JONES, in her individual  
capacity; OFFICER LEWIS, in his individual  
capacity; OFFICER NUNLEY, in his individual  
capacity; OFFICER POOL, in his individual  
capacity; LIEUTENANT PUTNAM, in his  
individual capacity; OFFICER SERRANO, in  
his individual capacity; OFFICER SHIRLEY, in  
his individual capacity; OFFICER SMITH, in his  
individual capacity; and OFFICER VASQUEZ,  
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155

**DECLARATION OF WILLIAM W.  
LOTHROP, DEPUTY DIRECTOR, FEDERAL  
BUREAU OF PRISONS**

1 I, WILLIAM W. LOTHROP, declare as follows:

2 1) I am the Deputy Director of the Federal Bureau of Prisons ("BOP").

3 2) I have personal knowledge of the facts set forth herein and if called as a witness I could  
4 competently so testify.

5 3) The content of this declaration relates to the ongoing management of FCI Dublin,  
6 including details about any future planning for the facility's re-opening.

7 4) The BOP has no immediate plans to re-open FCI Dublin, absent first addressing factors  
8 that have caused previous issues, including but not limited to staff misconduct; staff recruitment,  
9 training and retention; aging infrastructure; access to community medical care; and environmental and  
10 safety concerns.

11 5) BOP cannot definitively state FCI Dublin will never reopen. Certain factors impacting  
12 federal prisoner populations, like overcrowding, may require BOP to reopen FCI Dublin at some point  
13 in the future. Nevertheless, should the BOP decide to re-open FCI Dublin at a future date, it would not  
14 be as any type of BOP facility that would house female Adults-in-Custody (AICs).

15 6) The BOP had been seriously exploring the closure of FCI Dublin over the past couple  
16 years, as mounting challenges suggested that meeting expected standards might not be possible,  
17 including, most recently, the removal of several executive staff members on March 11, 2024.

18 7) The BOP has twelve minimum-security camps, five low-security facilities, eleven  
19 administrative security facilities and two medical centers that can house the former FCI Dublin AICs.  
20 While AICs generally remain at administrative security facilities for shorter time intervals, their  
21 placement at administrative security facilities is the result of careful, individualized placement decisions  
22 based upon the 18 U.S.C. § 3621(b) factors. The BOP is able to presently care for its female AIC  
23 population and anticipates the ability to meet their future needs without requiring the use of the FCI  
24 Dublin facility.

25 8) As time progresses, BOP will continue to transfer former Dublin AICs to other  
26 appropriate BOP facilities consistent with its obligations under federal law and policy.

1 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and  
2 correct.

3 Executed this 17th day of June, 2024.

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6 WILLIAM W. LOTHROP  
7 DEPUTY DIRECTOR  
8 BUREAU OF PRISONS  
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